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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Austin Flake and Logan Flake,
Plaintiffs,
vs.
Joseph Michael Arpaio, et al.,
Defendants.

No. CV 15-01132-PHX-NVW

**JOINT SUBMISSION REGARDING
ADDITIONAL DISCOVERY**

Pursuant to the Court's Order of March 20, 2018, the parties were not able to agree on a form of order reflecting this Court's Order allowing additional discovery regarding the power consumption charts. Accordingly, the parties submit the following proposed forms of order regarding additional discovery.

PLAINTIFFS' PROPOSED FORM OF ORDER

- Deposition of Jim Young regarding the power consumption charts;
- Deposition of Marie Trombi regarding the power consumption charts;
- Deposition of Shawn Steinberg regarding the power consumption charts;
- Deposition of Robert Kalinowski regarding the power consumption charts; and
- The production by Defendants of any documents reflecting communications regarding the power consumption charts authored or reviewed by any of the above deponents.

If any party discovers other information in the course of this discovery that they believe warrants additional discovery, they reserve the right to seek the Court's permission to pursue it.

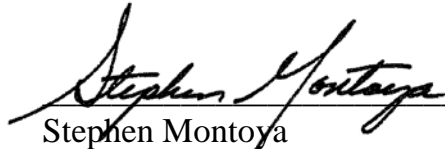
DEFENDANTS' PROPOSED FORM OF ORDER

- Limited, focused depositions of the following, concerning the power consumption charts: who prepared them, what Det. Marie Trombi's participation was, either as providing source information or reviewing it, or who was involved at the Maricopa County Attorney's Office:
 - Jim Young
 - Marie Trombi
 - Shawn Steinberg
 - Robert Kalinowski
- The production of communications between Det. Marie Trombi and prosecutors concerning the power consumption charts.

If any party discovers other information in the course of this discovery that they believe warrants additional discovery, they reserve the right to seek the Court's permission to pursue it.

Respectfully submitted this 27th day of March 2018.

MONTOKA, LUCERO & PASTOR, P.A.


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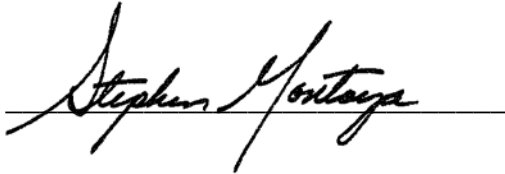
SACKS TIERNEY, P.A.

s/ Jeffrey S. Leonard (with permission)
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1 I hereby certify that on March 27, 2018, I electronically transmitted the foregoing
2 document to the Clerk of Court using the CM/ECF System for filing and transmittal of a
3 Notice of Electronic Filing to the following registrants:

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A handwritten signature in black ink, reading "Stephen Montoya", is written over a horizontal line.